

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In re: U LOCK INC.)
a/k/a U-LOCK INC.) Bank. 22-20823-GLT
)
Debtor.)
) RE: Docket Entry 315

DECLARATION OF SHANNI SNYDER

I, Shanni Snyder, declare and state under the penalty of perjury that the following is true and correct (28 USC 1746):

1. My name is Shanni Snyder. I am making this Declaration in response to the Court's Order at Entry 315, paragraph 3, asking for State Court contacts.
2. Below are the contacts I had with the Court of Common Pleas of Westmoreland County, Pennsylvania, the Superior Court of Pennsylvania, and the Pennsylvania Supreme Court.

Date	Court or Party	
5/9/2022 mailed, received by Court and docketed 5/11/2022	Supreme Court of Pennsylvania <i>Biros v. U Lock</i>	As the Supreme Court of Pennsylvania never remitted the record in the state court U Lock case, the appeal process was still active. <i>See</i> Exhibit A (showing active case). Therefore, I filed a Notice of Bankruptcy with that Court. <i>See</i> Exhibit B. The Supreme Court then stayed the case and it remains stayed and active. <i>See</i> Exhibit A. I mailed a copy of the document to William Otto (Biros counsel) and J. Allen Roth on May 9, 2022. They also received electronic notice from the Supreme Court of Pennsylvania's PACFILE system.
5/12/2022	William Otto	I emailed William Otto the following and

		<p>attached the Notice of Stay: “Mr. Otto: On April 25, 2022, pursuant to 11 USC 303, I filed a bankruptcy petition for U Lock Inc. Pursuant to 11 USC 362(a), there exists an automatic stay of all actions as to U Lock. Therefore, I have lodged the attached Suggestion of Bankruptcy in the civil matter as captioned.</p> <p>I request notice of all actions taken against U Lock and all appearances in the bankruptcy case. I am not an ECF member in the bankruptcy court so I require service by mail.</p> <p>A copy of this document has been mailed to your office as well.</p> <p>Govern yourself accordingly and, I remain, Respectfully yours, S. S. Snyder</p>
5/12/2022	<p>Westmoreland Court of Common Pleas</p> <p>Snyder v. U Lock and Christine Biros, et al, Case 22-CJ-00928</p>	<p>This is the Writ of Summons/Lis Pendens action discussed by Your Honor. A copy of the Docket is attached hereto as Exhibit C.</p> <p>On May 12, 2022, I filed a Notice of Bankruptcy with the Prothonotary. A copy of the Notice of Bankruptcy is attached at Exhibit D.</p>
5/12/2022	<p>Biros v. U Lock, 17 CJ 4886</p> <p>Snyder v. U Lock and Biros, 22 JC 00928</p>	<p>I visited the chambers of Hon. Judge Harry Smail, Court of Common Pleas. I spoke with his secretary. I provided the Notice of Bankruptcy issued by the bankruptcy court in the <i>U Lock</i> case, I told her it stayed all proceedings involving U Lock. I also provided a copy of Exhibit D. The secretary thanked me for the documents and I left.</p>
5/19/2022	<p>Biros v. U Lock, 17 CJ 4886</p> <p>Prothonotary, Westmoreland Court of Common Pleas</p>	<p>After Judge Smail received the bankruptcy notice on 5/12/2022, he issued various Orders in the U Lock case on 5/13/2022. To preserve my rights in case no stay existed, I visited the Prothonotary and filed a Notice of Appeal to the Superior Court of Pennsylvania. The Prothonotary made me file a Notice of Appearance, which I did and it is attached as Exhibit E. The appeal is attached as Exhibit F.</p>
5/19/2022	Judge Smail’s secretary	<p>I delivered a copy of the Notice of Appeal described above (Exhibit F) to the Judge Smail’s secretary. I simply said, “I have these documents for Judge Smail,” and she said, “Thank you very much.”</p>

5/23/2022	Superior Court of Pennsylvania	I received an email from the Superior Court of Pennsylvania asking me which attorneys represented whom. I replied and copied William Otto and J. Allen Roth. See Ex. G.
1/30/2023	Westmoreland Court of Common Pleas Snyder v. U Lock and Christine Biros, et al, Case 22-CJ-00928	At the direction of this Court, and as I agreed to do, I filed a Notice of Discontinuance of the Writ of Summons action and a withdrawal of the Lis Pendens. See Exhibit H.

3. I did not make any filings with the Superior Court or the Court of Common Pleas in connection with the appeal, which is stayed. A copy of the docket sheet is attached as Exhibit H.
4. Notably, the Judge in the *U Lock* state case docketed at 17 CJ 4886 did not issue an Order to me to file a Pennsylvania Appellate Rule 1925 statement outlining my issues on the appeal I took (although he did direct U Lock to file their issues). Therefore, I never expressed to the state court the basis of the perceived error, my legal position, or what issue I intended to raise on appeal for him to *sua sponte* address the matter. Ordinarily a judge asks for this per P.R.A.P. 1925 before rendering an Opinion. Had he done so, I would have reiterated that a stay existed.
5. The present status of the various cases cited above:
 - a. Pennsylvania Supreme Court matter – stay is in place, case remains active, Court never remitted the record or filed the decisions with the lower court due to the bankruptcy stay.
 - b. My Pennsylvania Superior Court appeal – stay is in place. Case is technically moot since this Court voided the Order I appealed.

- c. *Biros v. U Lock*, 17 CJ 4886 (CCP Westmoreland) – The state Court never regained jurisdiction under 210 Pa. Code 1701 as the Supreme Court never remitted the record or lodged its Order, or the Superior Court’s Order, onto the State Court docket denying U Lock’s appeals. In addition, the Court is aware of the bankruptcy stay. Nevertheless, it continues to act. The last occurrence was August 2018 when Attorney Otto petitioned for a stay of the tax sale as to the Route 30 property. This apparently was done with the permission of the Trustee.¹
- d. *Snyder v. U Lock and Christine Biros*, et al, Case 22-CJ-00928 – Per this Court’s directive and my agreement, I discontinued the *writ of summons* and withdrew the *lis pendens*.
- e. *Snyder v. U Lock*, Case 21 JU 4758 (Westmoreland C.C.P.). This is just the lodging of the federal court wage judgment from December 2021. No filings have been made in the case since the judgment has been lodged and no filings occurred after the bankruptcy stay.

Respectfully submitted,



Shanni Snyder
14390 Route 30
North Huntingdon PA 15642
412-368-2580
shannis@pm.me

¹ Probably Ms. Biros should have filed her petition in a separate proceeding naming the tax bureau as the respondent rather than in the U Lock civil case. However, It is unlikely a stay violation *if* the Trustee consented.

Supreme Court of Pennsylvania



Allocatur Docket Sheet

Docket Number: 259 WAL 2021

Page 1 of 3

February 10, 2023

CAPTION

Christine Biros, an individual, Respondent

v.

U Lock Inc., a Pennsylvania Corporation, Petitioner

CASE INFORMATION

Initiating Document: Petition for Allowance of Appeal

Case Status: Active

Journal Number:

Case Category: Civil

Case Type(s): Declaratory Judgment
Equity
Quiet Title
Real Property

CONSOLIDATED CASES

RELATED CASES

COUNSEL INFORMATION

Attorney: Roth, John Allen

Address: 805 S Alexandria
Latrobe, PA 15650

Phone No: (724) 537-0939

Receive Mail: Yes

Receive EMail: Yes

Email:

Representing: U Lock Inc., Petitioner

Pro Se: No

IFP Status:

Attorney: Otto, William E.
Law Firm of William E. Otto, Esq.

Address: Po Box 701
Murrysville, PA 15668

Phone No: (724) 519-8778

Receive Mail: Yes

Receive EMail: Yes

Email:

Representing: Biros, Christine, Respondent

Pro Se: No

IFP Status:

EXHIBIT A page 1

Supreme Court of Pennsylvania



Allocatur Docket Sheet

Docket Number: 259 WAL 2021

Page 2 of 3

February 10, 2023

SUPREME COURT INFORMATION

Appeal From:

Appeal Filed Below:

Probable Jurisdiction Noted:

Docketed Date:

August 27, 2021

Allocatur/Miscellaneous Granted:

Allocatur/Miscellaneous Docket No.:

Allocatur/Miscellaneous Grant Order:

FEE INFORMATION

Fee Dt	Fee Name	Fee Amt	Receipt Dt	Receipt No	Receipt Amt
08/27/2021	Petition for Allowance of Appeal Filed	90.25	08/27/2021	2021-SUP-W-002013	90.25

INTERMEDIATE APPELLATE COURT INFORMATION

Court Name:	Superior	Docket Number:	1841 WDA 2019
Date of Order:	May 21, 2021	Rearg/Recon Disp Date:	July 28, 2021
		Rearg/Recon Disposition:	Denied.
Judge(s):	Shogan, Jacqueline O. Stabile, Victor P. King, Megan		
Intermediate Appellate Court Action:	Affirmed.		
Referring Court:			

AGENCY/TRIAL COURT INFORMATION

Court Below:	Westmoreland County Court of Common Pleas		
County:	Westmoreland	Division:	Westmoreland County Civil Division
Date of Agency/Trial Court Order:	January 6, 2020		
Docket Number:	17 CJ 04886		
Judge(s):	Smail, Harry F.	OTN:	
Order Type:	Judgment		

ORIGINAL RECORD CONTENT

Original Record Item	Filed Date	Content/Description
----------------------	------------	---------------------

Record Remittal:

DISPOSITION INFORMATION

Related Journal No:		Judgment Date:	
Category:	Decided	Disposition Author:	Per Curiam
Disposition:	Order Denying Petition for Allowance of Appeal	Disposition Date:	January 19, 2022

Dispositional Filing:

Author:

Filed Date:

EXHIBIT A page 2

Supreme Court of Pennsylvania



Allocatur Docket Sheet

Docket Number: 259 WAL 2021

Page 3 of 3

February 10, 2023

DISPOSITION INFORMATION

DOCKET ENTRY

Filed Date	Docket Entry / Representing	Participant Type	Filed By
August 27, 2021	Petition for Allowance of Appeal	Petitioner	U Lock Inc.
August 27, 2021	Reproduced Record	Petitioner	U Lock Inc.
September 8, 2021	Answer to Petition for Allowance of Appeal	Respondent	Biros, Christine
January 19, 2022	Order Denying Petition for Allowance of Appeal		Per Curiam
Comments: AND NOW, this 19th day of January, 2022, the Petition for Allowance of Appeal is DENIED.			
January 19, 2022	Order Exited		Office of the Prothonotary
February 2, 2022	Application Pursuant to Pa.R.A.P. 2572(c) to Stay Remand of Record Pending US Supreme Court Review	Petitioner	U Lock Inc.
February 15, 2022	Answer to Application to Stay Remand and Application for Appropriate Security	Respondent	Biros, Christine
March 16, 2022	Order Granting Stay of Remand of Record Pending US Supreme Court Review		Per Curiam
Comments: AND NOW, this 16th day of March, 2022, the Application to Stay Remand of Record Pending United States Supreme Court Review is GRANTED. Additionally, in accordance with Pa.R.A.P. 2572(d), Petitioner is hereby instructed to pay all accrued and unpaid real estate taxes and to keep such taxes current during the pendency of its occupancy of the Property.			
March 16, 2022	Order Exited		Office of the Prothonotary
May 11, 2022	Bankruptcy Notice - Action Stayed		Supreme Court of Pennsylvania

CROSS COURT ACTIONS

Docket Number: 1841 WDA 2019

EXHIBIT A page 3

IN THE SUPREME COURT OF PENNSYLVANIA

U LOCK INC.,

Petitioner,

V.

CHRISTINE BIROS,

Respondent.

259 WAL 2021

RECEIVED

MAY 1 2022

SUPREME COURT
WESTERN DISTRICT

DECEMBER 1977

MAY 11 2022

Y SUPREME COURT
WESTERN DISTRICT

SUGGESTION OF BANKRUPTCY AND AUTOMATIC STAY

Petitioning Creditor in the bankruptcy case against U Lock Inc. hereby notifies this Court that a bankruptcy case has been filed against U Lock Inc. *In re: U Lock Inc.*, 2:2022bk20823 (Bk. W.Pa.).

Pursuant to 11 USC 362(a) this action is stayed.

This filing is made by interested party, lienholder on the property in question, and petitioning creditor Shanni Snyder.¹

Respectfully submitted,

John B. R.

Shanni Snyder
14390 Route 30
North Huntingdon PA 15642
(412) 758-1371

PETITIONING CREDITOR AND
INTERESTED PARTY

¹ Snyder cannot seek leave to intervene as doing so may constitute a violation of the automatic stay.

United States Bankruptcy Court
WESTERN DISTRICT OF PENNSYLVANIA

Notice of Involuntary Bankruptcy Case Filing

An involuntary bankruptcy case concerning the debtor(s) listed below was filed under Chapter 7 of the United States Bankruptcy Code, entered on 04/28/2022 at 4:53 PM and filed on 04/27/2022.

U LOCK INC
14140 U.S. Route 30
N. Huntingdon, PA 15642
Tax ID / EIN: 47-4994911
aka U-LOCK INC.



The case was filed by the following petitioning creditor(s):

Shanni Snyder
14390 Route 30
Unit H
North Huntingdon, PA 15642
SSN / ITIN: xxx-xx-6136

The case was assigned case number 22-20823-GLT to Judge Gregory L. Taddonio.

If you would like to view the bankruptcy petition and other documents filed by the petitioning creditor(s) and the debtor, they are available at our *Internet* home page <https://ecf.pawb.uscourts.gov> or at the Clerk's Office, U.S. Bankruptcy Court, 5414 U.S. Steel Tower, 600 Grant Street, Pittsburgh, PA 15219.

You may be a creditor of the debtor. If so, you will receive an additional notice from the court setting forth important deadlines.

Michael R. Rhodes
Clerk, U.S. Bankruptcy Court

CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the Case Records Public Access Policy of the Unified Judicial System of Pennsylvania that require filing confidential information and documents differently than non-confidential information and documents.



Shanni Snyder
14390 Route 30
North Huntingdon PA 15642
(412) 758-1371

CERTIFICATE OF SERVICE

I certify that on May 9, 2022, I caused a true copy of the foregoing to be served upon the following parties:

J. Allen Roth, Esq
805 S. Alexandria Street
Latrobe PA 15650

William Otto, Esq.
4027 Old William Penn Highway
Murrysville, PA 15668



Shanni Snyder

Case#	Caption	Reference File	Judgment Amt	Filed Date	Case Type/Subtype	Status	Judge
22CJ00928	SHANNI SNYDER VS. U LOCK INC/AKA			Apr/21/2022	LIS PENDENS NEW FILE	ACTIVE	

Parties

Party Type	Name	Address
DEFENDANT	U LOCK INC/AKA	PA, USA
DEFENDANT	U-LOCK INC	PA, USA
DEFENDANT	CHRISTINE BIROS	PA, USA
DEFENDANT	BIROS IRREVOCABLE LIFE INSURANCE TRUST	PA, USA
DEFENDANT	DENISE SCHUR/EXTRX	PA, USA
DEFENDANT	ALEX SCHUR/EST	PA, USA
PLAINTIFF	SHANNI SNYDER	14390 US RT 30, NORTH HUNTINGDON, PA, 15642, USA
DEFENDANT	HENRY L MOORE/EXE	PA, USA
DEFENDANT	SUSAN STANO/EXE	PA, USA
DEFENDANT	NICHOLAS SCHUR/EST	PA, USA
DEFENDANT	KATHLEEN S WALTER/EXE	PA, USA
DEFENDANT	MICHAEL SCHUR/EXE	PA, USA
DEFENDANT	CYNTHIA SARRIS/ADMIN	PA, USA
DEFENDANT	ANN SARRIS/EST	PA, USA
DEFENDANT	FRANK SCHIEFER	PA, USA
DEFENDANT	WESTMORELAND COUNTY RECORDER OF DEEDS	PA, USA
DEFENDANT	HARRY L SMAIL Jr.	PA, USA
DEFENDANT	JOSH SHAPIRO/ATTORNEY GENERAL	PA, USA

Events

Action Date	Action Description	Action Name	View Document
Jan/30/2023	*DISCONTINUANCE	WITHOUT PREJUDICE AND TO WITHDRAW LIS PENDENS	View
Jun/13/2022	SHERIFF'S RETURN	3 FOUND 2 NOT FOUND	View
May/12/2022	SUGGESTION OF BANKRUPTCY		View

EXHIBIT C page 1

Apr/21/2022 *PRAECIPE INDEX LIS
PENDENS

*PRAECIPE INDEX LIS PENDENS

[View](#)

IN THE COURT OF COMMON PLEAS OF WESTMORELAND COUNTY, PENNSYLVANIA
CIVIL ACTION

SHANNI SNYDER,

vs.

Case 22 CJ 00928

U LOCK INC. a/k/a U-LOCK INC.,
CHRISTINE BIROS, BIROS
IRREVOCABLE LIFE INSURANCE TRUST,
DENISE SCHUR executrix of the ESTATE
OF ALEX SCHUR, HENRY L. MOORE and
SUSAN STANO co-executors of the ESTATE
OF NICHOLAS SCHUR, KATHLEEN S.
WALTER executor of the ESTATE OF
MICHAEL SCHUR, CYNTHIA SARRIS
Administrator of the ESTATE OF ANN
SARRIS, FRANK SCHIEFER, in his official
capacity as WESTMORELAND COUNTY
RECORDER OF DEEDS for injunctive and
declaratory relief, and HARRY J. SMAIL
JR., pursuant to 42 USC 1983, in his official
capacity for declaratory relief,
JOSH SHAPIRO, ATTORNEY GENERAL
FOR THE COMMONWEALTH OF
PENNSYLVANIA, for declaratory relief,

TYPE OF PLEADING:
SUGGESTION OF BANKRUPTCY

FILED ON BEHALF OF:
SHANNI SNYDER, Plaintiff

Name of attorney or *pro se* party:

Shanni Snyder
14390 Route 30
N. Huntingdon, PA 15642
(412) 206-6850
shannis@pm.me

Defendants.

This action relates to the real property located
at 14140 US Route 30. North Huntingdon,
Pennsylvania, TAX MAP 54-03-10-0-103

§ FILED
PROTHONOTARY'S OFFICE
WESTMORELAND COUNTY
2022 MAY 12 A 11:10
GIRIA O'BARTO
TIME IN

**IN THE COURT OF COMMON PLEAS OF WESTMORELAND COUNTY, PENNSYLVANIA
CIVIL ACTION**

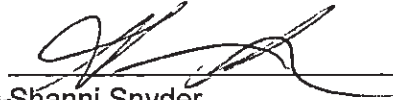
SHANNI SNYDER,)	
)	
vs.)	Case 22 CJ 00928
)	
U LOCK INC. a/k/a U-LOCK INC.,)	
CHRISTINE BIROS, BIROS)	
IRREVOCABLE LIFE INSURANCE TRUST,)	
DENISE SCHUR executrix of the ESTATE)	
OF ALEX SCHUR, HENRY L. MOORE and)	
SUSAN STANO co-executors of the ESTATE)	
OF NICHOLAS SCHUR, KATHLEEN S.)	
WALTER executor of the ESTATE OF)	
MICHAEL SCHUR, CYNTHIA SARRIS)	
Administrator of the ESTATE OF ANN)	
SARRIS, FRANK SCHIEFER, in his official)	
capacity as WESTMORELAND COUNTY)	
RECORDER OF DEEDS for injunctive and)	
declaratory relief, and HARRY J. SMAIL)	
JR., pursuant to 42 USC 1983, in his official)	
capacity for declaratory relief,)	
JOSH SHAPIRO, ATTORNEY GENERAL)	
FOR THE COMMONWEALTH OF)	
PENNSYLVANIA, for declaratory relief,)	
)	
Defendants.)	RE: TAX MAP 54-03-10-0-103

SUGGESTION OF BANKRUPTCY

To the Prothonotary:

Pursuant to 11 USC 362(a), an automatic stay exists in this case as a result of the filing of a bankruptcy petition pursuant to 11 USC 303 against Defendant U Lock Inc a/k/a U-Lock Inc. See *In re: U Lock Inc. a/k/a U-Lock Inc.*, 22-20823-GLT (Bk. W. Pa.); see also Exhibit A.

Respectfully submitted,



Shanni Snyder
14390 Route 30
North Huntingdon PA 15642
(412) 206-6850

PLAINTIFF

EXHIBIT D page 2

United States Bankruptcy Court
WESTERN DISTRICT OF PENNSYLVANIA

**Notice of Involuntary
Bankruptcy Case Filing**

An involuntary bankruptcy case concerning the debtor(s) listed below was filed under Chapter 7 of the United States Bankruptcy Code, entered on 04/28/2022 at 4:53 PM and filed on 04/27/2022.

U LOCK INC

14140 U.S. Route 30
N. Huntingdon, PA 15642
Tax ID / EIN: 47-4994911
aka **U-LOCK INC.**



The case was filed by the following petitioning creditor(s):

Shanni Snyder

14390 Route 30
Unit H
North Huntingdon, PA 15642
SSN / ITIN: xxx-xx-6136

The case was assigned case number 22-20823-GLT to Judge Gregory L. Taddonio. If you would like to view the bankruptcy petition and other documents filed by the petitioning creditor(s) and the debtor, they are available at our *Internet* home page <https://ecf.pawb.uscourts.gov> or at the Clerk's Office, U.S. Bankruptcy Court, 5414 U.S. Steel Tower, 600 Grant Street, Pittsburgh, PA 15219. You may be a creditor of the debtor. If so, you will receive an additional notice from the court setting forth important deadlines.

Michael R. Rhodes
Clerk, U.S. Bankruptcy
Court

CERTIFICATE OF SERVICE

I, Shanni Snyder, certify that I mailed a true copy of the foregoing to the following persons on May 12, 2022:

U Lock Inc.
14140 Route 30
North Huntingdon PA 15642

Christine Biros
435 Millers Lane
Pittsburgh PA 15239

Biros Irrevocable Life Insurance Trust
3001 JACks Run Road
White Oak PA 15131

Harry J. Smail Jr.
2 N. Main Street, Courtroom 2
Greensburg PA 15601

DENISE SCHUR executrix ESTATE OF ALEX SCHUR
8700 Cleveland Road
Creston OH 44217

HENRY L. MOORE and SUSAN STANO co-executors of the ESTATE OF NICHOLAS SCHUR
10 Keystone Commons
35 West Pittsburgh Street
Greensburg PA 15601

KATHLEEN S. WALTER executor of the ESTATE OF MICHAEL SCHUR
3 Ridge Court
Saratoga Springs NY 12866

CYNTHIA SARRIS Administrator of the ESTATE OF ANN SARRIS
14249 Hiland Place
Irwin PA 15642

FRANK SCHIEFER
WESTMORELAND COUNTY RECORDER OF DEEDS
40 N Pennsylvania Avenue, Suite 420
Greensburg PA 15601

Hon. Rita D. Hathaway
2 N Main Street, Courtroom

JOSH SHAPIRO, ATTORNEY GENERAL
FOR THE COMMONWEALTH OF PENNSYLVANIA
16th Floor, Strawberry Square
Harrisburg PA 17120


Shanni Snyder

IN THE COURT OF COMMON PLEAS OF WESTMORELAND
COUNTY, PENNSYLVANIA
CIVIL ACTION - CIVIL

Christine Biros

Plaintiff,

Versus

Case No. 17 CJ 04886

U LOUC Inc.

Defendant

Shanni Snyder non party Appellant

ENTRY OF APPEARANCE PURSUANT TO P.A.R.C.P. 1930.8

I, Shanni Snyder, hereby enter my appearance on behalf of (plaintiff) (defendant) and
(please circle one)

direct that pursuant To P.A. R.C.P. No.: 1930.8, I may be contacted at:

14390 US Rt 30

Number, Street, and Apartment Number (if any)

N. Huntingdon, PA 15642

City, State, Zip Code

(412) 758 1371 ov

Daytime Phone

(310) 498 5587

Facsimile Number (optional)

E-mail Address (optional)

FILED
PROTHONOTARY'S OFFICE
WESTMORELAND COUNTY
2022 MAY 19 A 10:07
GINA O'BARTO
TIME IN

I understand that I must supply a copy of this Entry of Appearance to all other parties or attorneys. I further understand that I must contact the Court should any of the above information change.

[Signature]
Signature

5/19/22
Date

EXHIBIT E

IN THE COURT OF COMMON PLEAS OF WESTMORELAND COUNTY, PENNSYLVANIA

CHRISTINE BIROS,

Case No. 17 CJ 04886

Plaintiff,

vs.

NOTICE OF APPEAL

U LOCK INC.,

Defendant,

SHANNI SNYDER,

Non-party Appellant.

Filed on behalf of:

Shanni Snyder, non-party
Appellant.

Counsel of record for this party:

Shanni Snyder
14390 Route 30
North Huntingdon PA 15642
(412) 206-6850
shannis@pm.me

FILED
PROTHONOTARY'S OFFICE
WESTMORELAND COUNTY
2022 MAY 19 A 10:07
GUHA O'BARTO
TIME IN

IN THE COURT OF COMMON PLEAS OF WESTMORELAND COUNTY, PENNSYLVANIA

CHRISTINE BIROS,

Case No. 17 CJ 04886

Plaintiff,

vs.

U LOCK INC.,

Debtor in Bankruptcy,

SHANNI SNYDER,

Non-party Appellant.

NOTICE OF APPEAL


Notice is hereby give that non-party Shanni Snyder, an individual who is judgment creditor at case 21-JU-04758 of debtor in bankruptcy and defendant U Lock Inc., and holding a lien on all assets of said defendant, and harmed by the actions of this Court which rendered an Order that eviscerates and appears to supersede portions of her judgment lien, hereby appeals to the Superior Court of Pennsylvania from the Order entered in the above case at 11:47 a.m. on the 17th day of May, 2022 (directing the Prothonotary to issue a *Writ of Possession* that includes terms to “authorize levy and sale of any property of Defendant U Lock” in favor of Plaintiff Christine Biros).

TRANSCRIPT ORDER: Shanni Snyder hereby orders a transcript of the hearing in connection with this appeal. Said hearing occurred on an unknown date not contained on

EXHIBIT F page 2

the docket and without public notice.

Respectfully submitted,



Shanni Snyder
14390 Route 30
North Huntingdon PA 15642
(412) 206-6850
shannis@pm.me

VERIFICATION OF SERVICE

I, Shanni Snyder, verify under the penalty for unsworn falsification to authorities that I mailed a copy of this document to the following persons in this case on the 18th day of May, 2022, by First Class Mail:

William E. Otto, Esq.
PO Box 701
Murrysville, PA 15668

Dennis D. Del Cotto, Esq.
4345 Old William Penn Highway
Murrysville, PA 15668

William F. Ross, Esq.
406 N. Market Street
Wooster, OH 44691

John Tumolo, Esq.
Suite 1500, Frick Building
Pittsburgh, PA 15219

Hon. Harry F. Smail
Court of Common Pleas
2 N Main Street, Courtroom 2
Greensburg PA 15601

Court Administrator
Court of Common Pleas
2 N Main Streert
Greensburg PA 15601



Shanni Snyder

Kimberly Kieser

From: Shanni S. <shannis@pm.me>
Sent: Monday, May 23, 2022 2:32 PM
To: Superior Court Prothonotary (Pgh)
Cc: delcottolaw@windstream.net; J. Allen Roth; weo@ottolawfirm.com
Subject: Re: Biros v. U Lock appeal

CAUTION: This is an external email. Please think before you click on an attachment or link!

Dear Ms. Kieser:

Thank you for your email.

I note that I omitted J. Allen Roth, 805 S. Alexandria Street, Latrobe PA 15650, from the service list, who represents U Lock Inc., but I did serve his office.

William Otto represents Christine Biros.

The other three attorneys represent estates that were removed from the action per Order of Court and the caption amended by the judge, but they appear to be routinely served by the parties to the case as a courtesy. (They are still listed on the docket).

Dennis del Cotto represents Estates of Nicholas Schur, Alex Schur, and Ann Sarris

John Tumolo represents Kathleen S. Walter Executor of Estate of Michael Schur

William Ross *seems* to represent the estate of Denise Schur, As I was not a party to the original action, I am unclear if he actually appeared in the case or was served as a courtesy. I cannot locate an actual appearance on the docket.

I have copied this email to the other attorneys in case I am mistaken.

Shanni Snyder

----- Original Message -----

On Monday, May 23rd, 2022 at 11:11 AM, Superior Court Prothonotary (Pgh) <pghpro@pacourts.us> wrote:

Re: Christine Biros v. U Lock Inc.

17 CJ 04886

Good afternoon Ms. Snyder,

The Superior Court has received your notice of appeal in the above-captioned case. However, before I can docket the appeal, I need further information from you. On your proof of service, you listed four attorneys. However, you did not indicate who these attorneys represent. Please contact me as soon as possible with this information so I can process your appeal in a timely manner. The attorneys are as follows:

1. William Otto
2. Dennis Del Cotto
3. William Ross
4. John Tumolo

Very truly yours,

Kimberly Kieser, Esq.

Deputy Case Flow Manager

Superior Court Prothonotary

(412) 565-7592

EXHIBIT G page 2

Appeal Docket Sheet**Superior Court of Pennsylvania****Docket Number: 607 WDA 2022****Page 1 of 4****February 10, 2023****CAPTION**

Christine Biros, an individual

v.

U Lock Inc., a Pennsylvania Corporation

Appeal of: Shanni Snyder

CASE INFORMATION

Initiating Document: Notice of Appeal

Case Status: Active

Case Processing Status: August 15, 2022 Bankruptcy Stay

Journal Number:

Case Category: Civil Case Type(s): Declaratory Judgment

CONSOLIDATED CASES**RELATED CASES**

Docket No / Reason

Type

615 WDA 2022
Same Issue(s)

Related

617 WDA 2022
Same Issue(s)

Related

650 WDA 2022
Same Issue(s)

Related

SCHEDULED EVENT

Next Event Type: Receive Docketing Statement

Next Event Due Date: June 7, 2022

Next Event Type: Appellant Reproduced Record Filed

Next Event Due Date: August 29, 2022

COUNSEL INFORMATION**Appellant Snyder, Shanni**

Pro Se: Yes

IFP Status: No

Pro Se: Shanni Snyder

Address: 14390 U.S. Route 30
North Huntingdon, PA 15642

Phone No: (412) 758-1371 Fax No:

Appellee Biros, Christine

Pro Se: No

IFP Status: No

Attorney: Otto, William E.

Address: Po Box 701
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Phone No: (724) 519-8778 Fax No:

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Appeal Docket Sheet

Superior Court of Pennsylvania

Docket Number: 607 WDA 2022

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COUNSEL INFORMATION

Participant U Lock Inc.
Pro Se: No
IFP Status: No
Attorney: Roth, John Allen
Address: 805 S Alexandria
Latrobe, PA 15650
Phone No: (724) 537-0939 **Fax No:**

FEE INFORMATION

Fee Dt	Fee Name	Fee Amt	Receipt Dt	Receipt No	Receipt Amt
05/24/2022	Notice of Appeal	90.25			0.00

AGENCY/TRIAL COURT INFORMATION

Order Appealed From: May 17, 2022 **Notice of Appeal Filed:** May 19, 2022
Order Type: Order Entered
Documents Received: May 24, 2022

Court Below: Westmoreland County Court of Common Pleas
County: Westmoreland **Division:** Westmoreland County Civil Division
Judge: Smail, Harry F. **OTN:**
Docket Number: 17 CJ 04886 **Judicial District:** 10

ORIGINAL RECORD CONTENT

Original Record Item	Filed Date	Content Description
Original Record	July 20, 2022	1 Part
Comment: additional papers filed at 1841 WDA 2021 (box)		
Testimony	July 20, 2022	1
Trial Court Opinion	July 20, 2022	

Date of Remand of Record:

BRIEFING SCHEDULE

Appellant	Appellee
Snyder, Shanni	Biros, Christine
Brief	Brief
Reproduced Record	Participant
	U Lock Inc.
	Brief

DOCKET ENTRY

Filed Date	Docket Entry / Representing	Participant Type	Filed By
May 24, 2022	Notice of Appeal Docketed		
		Appellant	Snyder, Shanni
	Comment: Invoice sent for unpaid filing fees associated with the NOA		
May 24, 2022	Docketing Statement Exited (Civil)		

Superior Court of Pennsylvania

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Appeal Docket Sheet

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DOCKET ENTRY

Filed Date	Docket Entry / Representing	Participant Type	Filed By
June 23, 2022	Bankruptcy Notice Filed	Participant	U Lock Inc.
July 18, 2022	Order - Rule to Show Cause		Per Curiam
	Comment: In light of the May 20, 2022 "Expedited Motion to Dismiss Case, in addition to Motion for Sanctions Against Petitioning Creditor, or in the Alternative, Motion for Relief from Stay" filed by Appellee Christine Biros at No. 22-20823-GLT in the Bankruptcy Court of the Western District of Pennsylvania for which a hearing is currently scheduled on August 9, 2022, Appellee U Lock, Inc. is directed to show cause, in the form of a letter addressed to the Prothonotary of this Court with a copy to opposing counsel as to why a bankruptcy stay should be entered in this appeal. The letter shall be transmitted so as to be actually received by the Prothonotary within ten (10) days from the date of this Order. Failure to comply with this Order may result in quashal or dismissal of the appeal without further notice.		
July 20, 2022	Trial Court Record Received		Westmoreland County Civil Division
July 20, 2022	Briefing Schedule Issued		Superior Court of Pennsylvania
July 20, 2022	Transcripts of Testimony		Westmoreland County Civil Division
July 20, 2022	Trial Court Opinion Received		Westmoreland County Civil Division
August 2, 2022	Response to Rule to Show Cause	Participant	U Lock Inc.
August 15, 2022	Bankruptcy Notice - Action Stayed		Superior Court of Pennsylvania
	Comment: Upon notice that Participant U Lock Inc. initiated bankruptcy proceedings in the United States Bankruptcy Court for the Western District of Pennsylvania at No. 22-20823-GLT, the above-captioned appeal is STAYED in accordance with the automatic stay provision of the United States Bankruptcy Code, 11 U.S.C. § 362. The parties shall be responsible for notifying this Court that: (1) the stay pursuant to the Bankruptcy Code is no longer in effect due to the issuance of an order by the Bankruptcy Court either lifting the automatic stay or providing for severance of any of the parties, in which case this Court will proceed with this appeal; or (2) the above-captioned appeal has been rendered moot by conclusion of the bankruptcy proceedings. The parties shall be responsible for providing an initial update to this Court, in no less than six (6) months, or no later than February 13, 2022, as to the status of the bankruptcy proceedings. The Prothonotary of this Court is directed to VACATE the briefing schedule which shall be reset after the bankruptcy stay is lifted.		

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Appeal Docket Sheet

Superior Court of Pennsylvania

Docket Number: 607 WDA 2022

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DOCKET ENTRY

Filed Date	Docket Entry / Representing	Participant Type	Filed By
August 23, 2022	Bankruptcy Notice - Action Stayed		

Superior Court of Pennsylvania

Document Name: Amended - Corrected Date

Comment: Upon notice that Participant U Lock Inc. initiated bankruptcy proceedings in the United States Bankruptcy Court for the Western District of Pennsylvania at No. 22-20823-GLT, the above-captioned appeal is STAYED in accordance with the automatic stay provision of the United States Bankruptcy Code, 11 U.S.C. § 362.

The parties shall be responsible for notifying this Court that: (1) the stay pursuant to the Bankruptcy Code is no longer in effect due to the issuance of an order by the Bankruptcy Court either lifting the automatic stay or providing for severance of any of the parties, in which case this Court will proceed with this appeal; or (2) the above-captioned appeal has been rendered moot by conclusion of the bankruptcy proceedings.

The parties shall be responsible for providing an initial update to this Court, in no less than six (6) months, or no later than February 13, 2023, as to the status of the bankruptcy proceedings.

The Prothonotary of this Court is directed to VACATE the briefing schedule which shall be reset after the bankruptcy stay is lifted.

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